



**Air Quality  
PERMIT TO CONSTRUCT**

**State of Idaho  
Department of Environmental Quality**

**PERMIT No.:** P-060132

**FACILITY ID No.:** 079-00038

**AQCR:** 62

**CLASS:** A

**SIC:** 3084

**ZONE:** 11

**UTM COORDINATE (km):** 580.3, 5258.9

1. **PERMITTEE**  
Spunstrand, Inc.

2. **PROJECT**  
Initial Permit to Construct

3. **MAILING ADDRESS**  
P. O. Box 1147

**CITY**  
Wallace

**STATE**  
ID

**ZIP**  
83873

4. **FACILITY CONTACT**  
Jay DeLeon

**TITLE**  
Plant Superintendent

**TELEPHONE**  
(208) 752-1157

5. **RESPONSIBLE OFFICIAL**  
Edgar H. Nelson

**TITLE**  
Vice President of Manufacturing

**TELEPHONE**  
(208) 752-1157

6. **EXACT PLANT LOCATION**  
60662 Northside Frontage Road

**COUNTY**  
Shoshone

7. **GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**  
Fiberglass filament winding

8. **GENERAL CONDITIONS**

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.

\_\_\_\_\_  
ALMER CASILE, PERMIT WRITER  
DEPARTMENT OF ENVIRONMENTAL QUALITY

**DATE MODIFIED/REVISED:**

**DATE ISSUED:**

**DRAFT**

\_\_\_\_\_  
MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER  
DEPARTMENT OF ENVIRONMENTAL QUALITY

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## Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
PTE	potential to emit
SIC	Standard Industrial Classification
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

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<b>Location:</b>	Wallace, Idaho	

**1. PERMIT TO CONSTRUCT SCOPE**

***Purpose***

- 1.1 This permit to construct (PTC) is the facility's initial permit to construct, incorporates 40 CFR 63, Subpart WWWW, and establishes the facility as a Tier I source.

***Regulated Sources***

Table 1.1 lists all sources of regulated emissions in this PTC.

**Table 1.1 SUMMARY OF REGULATED SOURCES**

<b>Permit Section</b>	<b>Source Description</b>	<b>Emissions Control(s)</b>
2	Dust Collection Cyclone	Cyclone
2	Fabrication	None

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## **2. FABRICATION**

### **2.1 Source Description**

Fabrication of fiberglass reinforced duct work, pipes, tubing, and tanks using a filament winding process. The facility consists of three work areas: Main Building, Mark 8 Building, and Warehouse. The Main Building contains three winding machines, a pulling station, a cutting station, and a chopper station. The Mark 8 contains two winding machines and a pulling station. The Warehouse is used for storage and packaging.

### **2.2 Emissions Control Description**

A dust collection cyclone is used to control emissions from the cutting and trimming of products.

## ***Limitations***

### **2.3 MACT Limitations, Work Practice Standards & Compliance Deadlines**

On and after the compliance date specified in 40 CFR 63.5800 and 40 CFR 63, Subpart WWWW, Table 2, the permittee shall comply with the applicable compliance deadlines, emission limitations, operating limitations and work practice standards of the National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW. Please refer to the following sections of the rule

- Compliance Deadline: 40 CFR 63.5800; 40 CFR 63 Subpart WWWW, Table 2
- Emission Limitations: 40 CFR 63.5805(b); 40 CFR 63 Subpart WWWW, Table 3
- Work Practice Standards: 40 CFR 63.5805(b); 40 CFR 63 Subpart WWWW, Table 4

### **2.4 PM<sub>10</sub> Emission Limits**

Emissions of PM<sub>10</sub> from the dust collection cyclone shall not exceed any corresponding emission limit listed in Table 2.1.

**Table 2.1 EMISSIONS LIMITS**

<b>Pollutant</b>	<b>PM<sub>10</sub></b>
	<b>Lb/day</b>
Dust Collection Cyclone	14.4

### **2.5 Opacity Limit**

Emissions from the dust collection cyclone stack, or any other stack, vent, or functionally equivalent opening associated with the coating application process, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

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## **2.6     Odorous Emissions**

In accordance with IDAPA 58.01.01.776, odorous gases shall not be emitted to the atmosphere in such quantities as to cause air pollution.

## ***Compliance Demonstration Requirements***

### **2.7     MACT Compliance Demonstration Requirements**

On and after the compliance date specified in 40 CFR 63.5800 and 40 CFR 63, Subpart WWWW, Table 2, the permittee shall comply with the applicable compliance demonstration requirements of the National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW. Please refer to the following sections of the rule

- Options For Meeting The Standards For Open Molding And Centrifugal Casting Operations At New And Existing Sources: 40 CFR 63.5810.
- General Compliance Requirements: 40 CFR 63.5835.
- Performance Test Or Other Initial Compliance Demonstration: 40 CFR 63.5840, 40 CFR 63.5860.
- Continuous Compliance Demonstration: 40 CFR 63.5895, 40 CFR 63.5900
- Recordkeeping: 40 CFR 63.5905, 40 CFR 63.5910, 40 CFR 63.5915, 40 CFR 63.5920.

### **2.8     Dust Collection Cyclone**

- The permittee shall not trim and/or cut products unless the dust collection cyclone is in operation.
- Within 60 days after issuance of this permit, the permittee shall have developed an O&M manual for the cyclone listed in Table 2.1. The O&M manual shall be based on the cyclone manufacturer's specifications and recommendations and shall describe the procedures that will be followed to comply with General Provision 2. The O&M manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

### **2.9     Odor Management Plan**

Within 60 days of issuance of this permit, the permittee shall have developed an Odor Management Plan for the facility. The plan shall describe procedures that will be followed to comply with Permit Condition 2.6. The plan shall include, but not be limited to, the following provisions:

- Maintain negative air pressure inside the buildings.
- Keep all storage containers and vessels closed when not in use.

## ***Notification and Reporting Requirements***

### **2.10     MACT Notifications And Reporting Requirements**

On and after the compliance date specified in 40 CFR 63.5800 and 40 CFR 63, Subpart WWWW, Table 2, the permittee shall comply with the applicable notification and reporting requirements of the National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW. Please refer to the following sections of the rule:

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- Notifications: 40 CFR 63.5905; 40 CFR 63, Table 13
- Initial Compliance Report: 40 CFR 63.5910.
- Semiannual Report: 40 CFR 63.5910.

**2.11 Certification of Documents**

All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications shall be submitted in accordance with General Provision 9.

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### **3. PERMIT TO CONSTRUCT GENERAL PROVISIONS**

#### ***General Compliance***

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.  
**[Idaho Code §39-101, et seq.]**
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.  
**[IDAPA 58.01.01.211, 5/1/94]**
3. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.  
**[IDAPA 58.01.01.212.01, 5/1/94]**

#### ***Inspection and Entry***

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
  - a. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.**[Idaho Code §39-108]**

#### ***Construction and Operation Notification***

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
  - a. A notification of the date of initiation of construction, within five working days after occurrence;
  - b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;



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- c. A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211, 5/1/94]

### ***Performance Testing***

6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

### ***Monitoring and Recordkeeping***

7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

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***Excess Emissions***

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

**[IDAPA 58.01.01.130-136, 4/5/00]**

***Certification***

9. All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

**[IDAPA 58.01.01.123, 5/1/94]**

***False Statements***

10. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

**[IDAPA 58.01.01.125, 3/23/98]**

***Tampering***

11. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

**[IDAPA 58.01.01.126, 3/23/98]**

***Transferability***

12. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

**[IDAPA 58.01.01.209.06, 4/11/06]**

***Severability***

13. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.